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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BIG ROCK ASSETS MANAGERMENTS, LLC,
a Nevada limited liability company,

Plaintiff,

v.

NATIONAL DEFAULT SERVICING
CORPORATION, an Arizona corporation;
BANK OF AMERICA, N.A., a national banking
association; DOES I through X; and ROE
BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No. 2:22-cv-01543-APG-EJY

**STIPULATION AND ORDER TO
EXTEND BRIEFING DEADLINES**

(SECOND REQUEST)

Plaintiff Big Rock Assets Management, LLC and defendant Bank of America, N.A. (**BANA**) stipulate to extend the responsive deadlines as follows:

BANA shall have an additional fourteen (14) days, up to and including **March 13, 2023**, to file its opposition to Big Rock's motion to remand and for attorney's fees under 28 U.S.C. 1447 (c) (**motion to remand**), which is currently due on February 27, 2023. ECF Nos. 15-16. Big Rock filed its motion to remand on January 23, 2023. *Id.*

BANA shall have an additional fourteen (14) days, up to and including **March 14, 2023**, to file its opposition to Big Rock's motion to stay proceedings on defendant Bank of America's motions

to dismiss [ECF No. 13] and expunge lis pendens [ECF No. 14] and motion for order shortening time pursuant to LR IA-6-1 (**motion to stay**), which is currently due on February 28, 2023. ECF Nos. 17 & 18. Big Rock filed its motion to stay on January 24, 2023. *Id.*

Big Rock shall have until ten (10) days after this court rules on the motion to stay to file its opposition to BANA's motion to dismiss and expunge lis pendens (**motion to dismiss**), which was due on February 6, 2023. ECF Nos. 13 & 14. BANA filed its motion to dismiss on January 23, 2023. *Id.*

The parties are requesting additional time due to ongoing settlement negotiations in this case and other related cases. BANA also requests additional time to secure Federal Housing Finance Agency approval on its opposition briefs. Big Rock also requests additional time to avoid having to draft a response to BANA's motion to dismiss if the court grants its motion to stay. This is the parties' second request for an extension of these deadlines, and is not intended to cause any delay or prejudice to any party.

DATED this 23rd day of February, 2023.

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<p><u>/s/ Donna M. Wittig</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 DONNA M. WITTIG, ESQ. Nevada Bar No. 11015 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 Attorneys for Bank of America, N.A.</p>	<p><u>/s/ Joseph Y. Hong</u> JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Plaza Drive, Suite 650 Las Vegas, NV 89135 Attorney for Big Rock Assets Management, LLC</p>

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: February 23, 2023